# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF HAWAII

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In the Matter of	)	
PUBLIC UTILITIES COMMISSION	)	Docket No. 2008-0273
Instituting a Proceeding to Investigate the Implementation Of Feed-in Tariffs	) )	
	)	

PUBLIC UTILITIES COMMISSION

### **HAIKU DESIGN AND ANALYSIS**

## INFORMATION REQUESTS TO HAWAIIAN ELECTRIC COMPANY AND THE CONSUMER

### ADVOCATE REGARDING THE JOINT PROPOSAL

<u>AND</u>

**CERTIFICATE OF SERVICE** 

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### **HAIKU DESIGN AND ANALYSIS**

# INFORMATION REQUESTS TO HAWAIIAN ELECTRIC COMPANY AND THE CONSUMER ADVOCATE REGARDING THE JOINT PROPOSAL

Carl Freedman, dba Haiku Design and Analysis (HDA) respectfully offers the following information requests to the Hawaiian Electric Company (HECO) regarding the "JOINT PROPOSAL ON FEED-IN TARIFFS OF THE HECO COMPANIES AND CONSUMER ADVOCATE" and appendices filed by HECO and the Consumer Advocate in this docket on December 23, 2008. Because HECO has taken the lead in this particular matter and to simplify responses, HDA addresses its information requests solely to HECO but welcomes responses from HECO, the Consumer Advocate or joint responses as HECO and the Consumer Advocate decide is appropriate.

**HDA/HECO-IR-1** Regarding potential curtailments of renewable energy generation provided in accordance with the HECO/CA proposed feed-in tariff design:

- (a) Would the proposed feed-in tariff design guarantee the purchase of any minimum amount or percentage of energy made available by the generator (over the life of the contract, annually or for any other period of time)?
- (b) Would there be any specified limits to the amount or percentage of the energy made available by the generator that would be curtailed without payment (over the life of the contract, annually or for any other period of time)?
- (c) Please provide any existing projections or estimates of the amount of curtailment of feed-in tariff generation for any of the HECO Company systems and any technology types?
- (d) Is it possible for a prospective generator to determine the amount of curtailment (without payment) that would occur over the term of the feed-in tariff contract and, if so, how?

**HDA/HECO-IR-2** Would the proposed feed-in tariff specify what specific conditions would result in curtailment (without payment) of feed-in tariff generation?

- (a) Please identify these conditions.
- (b) Would any standards or procedures be specified to determine when the generator would be curtailed without payment?

**HDA/HECO-IR-3** When curtailment of generation is necessary how would it be determined which generator(s) would be curtailed? Would any standards or procedures be established?

**HDA/HECO-IR-4** Would the frequency and/or duration of curtailments of feed-in tariff generation increase as additional as-available generation is added to the utility system?

- (a) If so, how would any anticipated increases in curtailments resulting from later contracts be considered in earlier feed-in tariff contracts?
- (b) Would contract terms in earlier contracts be different (regarding curtailment) than terms in later contracts?

**HDA/HECO-IR-5** Please identify any measures (and expected implementation dates) that are being taken by the HECO Companies to increase the amount of as-available renewable generation that can be integrated into each utility system.

HDA/HECO-IR-6 At the January 20, 2009 informal technical conference regarding the HECO/CA feed-in tariff proposal HDA was referred to Exhibit A of the October Energy Agreement to identify the amount of renewable generation for each HECO utility that would be provided by feed-in tariffs by specific dates. Please identify which and/or what portions of each of the resources in Exhibit A is expected to be provided through implementation of feed-in tariffs. As an alternative response, please provide a similarly detailed schedule of resources expected to be implemented by feed-in tariff by the dates identified in Exhibit A.

#### CERTIFICATE OF SERVICE

The foregoing HAIKU DESIGN AND ANALYSIS INFORMATION REQUESTS TO

HAWAIIAN ELECTRIC COMPANY AND THE CONSUMER ADVOCATE REGARDING THE

JOINT PROPOSAL was served by electronic transmission in PDF and Word formats on the date of signature below to the following parties in this docket except that the Division of Consumer

Advocacy was also served two correct hard copies by first class mail posted on the same date:

CATHERINE P. AWAKUNI
EXECUTIVE DIRECTOR
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2 Copies U.S.Mail and Electronic Transmission

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ATTORNEY AT LAW, A LAW CORPORATION

Counsel for ALEXANDER & BALDWIN, INC.,

Through its division, HAWAIIAN COMMERCIAL & SUGAR COMPANY

Dated: Jar

January 25, 2009; Haiku, Hawaii

Signed:

Carl Freedman

dba Haiku Design and Analysis